

#205 PERM
UIC Permit Files

Permanent



UIC 0771

Region 8

36792

2396-1013

Checklist - Administrative Record

Century Oil & Gas Corporation
Date Received 30 July 1984

SPRINGS #1 SWDW
NW 27-29N-50E.

PERMIT APPLICATION REVIEW CHECKLIST

- I. For a new well (including conversions) there are 30 days to determine completeness. For an existing well, there are 60 days.
- II. All application requirements must be fulfilled. Requirements can be found in 144.31 as follows (this includes the amendment made in the May 11 promulgation, addition of 144.31(9)):
- A. All applicants for permits shall provide the following information to EPA using the standard permit application form:

1. The activities conducted by the applicant which require it to obtain a UIC permit.
2. Name, mailing address and location of the facility for which the application is submitted.
3. Up to four SIC codes which best reflect the principal products or services provided by the facility. *Should be 1389*
4. Operator's name, address, telephone number, ownership status and status as Federal, State, private, public or other entity. *OK*
5. Whether the facility is located on Indian lands. *Yes.*
6. Listing of all permits or construction approvals received or applied for under any of the following programs: UIC; NPDES; PSD; Nonattainment; NESHAPS; 404; Other relevant environmental permits, including State permits.
7. Topographic map (or other, if topo is unavailable) extending one mile beyond the property boundaries of the source, depicting facility; each well where fluids are injected underground, springs and other surface water boundaries, and drinking water wells listed in public record or otherwise known to applicant within 1/4 mile of facility property boundary.
8. Brief description of nature of business. — *Not available to extent necessary. What do we expect?*
9. List of names and addresses of all owners of record of land within 1/4 mile of facility boundary. *OK*

10. All required attachments as listed below. See the reverse of the permit application form for details.

II existing

A, E, G, H, M, Q, R - U

OPTIONAL

J, K, O, P (Q?)

8/9 - TO Engle/Boguth
for processing

302 For surface casing does not seem like it is into casing.
Need additional geologic info to determine that Fox Hills/Hell Creek and Fort Union are not available.

OK
Perman
up this
found
in 144.319
Not on
Form.
But still
to be reported
to.

*Located on
Indian lands.
What is office
procedure?
No permit for
telephony*

*(a) Need to have the
top half of the map
included.
(b) Exhibit I does not
agree w/ Exhibit II.
Sketch of 27-29 and 29-3
27-3
(c) 27-3 abandoned.
NO!*

Attachments for Class II Wells (Existing)

NE NW 27-29N-50E

- a. Area of Review Methods
- x e. Name and Depth of USDWs - *what about SS. above Judith? Porchello, Yes?*
- x g. Geological Data on Injection and Confining Zone - *Are they allowed to inject in Judith? It is not included in Agency Exemption*
- x h. Operating Data - *Incomplete* *max rate = ? Volume = ?* *Confining zone* *Thickness* *Ex gradient*
- x m. Construction Details *XII + IX* *Injection zone*
- x n. Plugging and Abandonment Plan
- x o. Financial Responsibility
- x s. Aquifer Exemption Requests *Not needed.*
- x t. Existing EPA Permits
- x u. Description of Business *need to amplify.*

Attachments for Class II Wells (New)

- a. Area of Review Methods
- b. Maps of Wells/Area and Area of Review
- c. Corrective Action Plan and Well Data
- e. Name and Depth of USDWs
- g. Geological Data on Injection and Confining Zone
- h. Operating Data
- m. Construction Details
- q. Plugging and Abandonment Plan
- r. Financial Responsibility

See addendum in back
Poplar Area
Exempted Dakota - 3573
3278
3446
3490
Judith 3534-3536

B. If the well needs an aquifer exemption, get the necessary information from the application, or request it from the applicant. The well cannot be permitted without an aquifer exemption. *OK*

C. All signature and certification requirements must also be complied with. Requirements are listed in 144.32. They are as follows:

- X* 1. All permit applications shall be signed as follows:
- No written authorization by Vice President or higher to allow John Williams to sign form 7320-6*
- a. For a corporation: by a principal executive officer of at least the level of a vice-president;
 - b. For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or
 - c. For a municipality; State, Federal or other public agency: By either a principal executive or ranking elected official.

D. For Class II wells only, the permit application may also be signed by a duly authorized representative of any person in the above paragraph. Duly authorized representatives are described in 144.32(b).

III. If the application is incomplete, list all the information necessary to make the application complete, and draft a transmittal letter for the RA's signature requesting the missing information.

IV. If the application is complete, prepare a letter for the RA's signature notifying the applicant of the determination of completeness and of the effective date of the permit application. If the permit is for a major facility, draft a project decision schedule as well.

Added Page
2-4000
99-TO Engle
for processing.

DETERMINATION OF COMPLETENESS
for
CENTURY Oil & Gas Corporation's GOINGS # 1 SWQW.
NW27-29N-50E
Specifcs

In order for the application to be determined complete the following additional information must be provided.

✓ 1) The more appropriate SIC code for this facility, which is the injection well, is 1389. The SIC code provided, i.e. 1311, is more appropriate for a production well. However, because the site has a heater treater the 1311 is ^{appropriate for gravel obtained gas} the secondary product of the facility, ~~because oil will be~~ siphoned off.

✓ 2) What ^{other} State permits have been granted to this injection well? Doesn't the Executive Secretary, Dee Richman need to sign the permit document before it becomes effective? Do they have a BSM permit. This well is on Indian lands

✓ 3) The top portion of topography map in Exhibit I is missing. This ~~missing~~ portion is within the one mile radius. Also note that Exhibit I does agree with Exhibit II see plotting of 27-1 and 27-3 and the radius of one mile

circle.

✓ 4) Need a brief description of the business activity that occurs at the injection well in addition to what Century Oil & Gas Corporation does. This requirement is found ^{they} in Attachment A.

✓ 5) On Attachment E there is to be a listing of the name and depth of any USDs above the injection formation. Why weren't the sandstones like Fox Hill, Hell Creek, Fort Union listed?
297-2634 TDS 723-3200 TDS
The geologist information submitted as part of Attachment E was incomplete to demonstrate that the Fox Hills/Hell Creek and Fort Union formations outcrop in the area around the well.

✓ 6) Geological data needs to be amplified. A local geological map needs to be furnished. The ^{thickness of} depth of the confining zone and its fracture pressure need to be furnished (include how fracture gradient was determined). The injection zone thickness and fracture pressure also need to be provided. (The fracture formation requires

500 psi injection pressure to move fluids
into formation)

- 7) The operating data required in
Attachment H ^{are} incomplete. What
are the maximum injection rate and
volume of injected fluids? What is
the maximum ^{injection} pressure?
- 8) The application needs a written
authorization from a ^{company} vice president
or higher to appoint Jack B. McWilliams
as a duly authorized representative.
- 9) The application needs a list of names
and addresses of all owners of record
of land within ~~1/4~~ mile of the injection well.
on Indian land 1/2

ROUTING AND TRANSMITTAL SLIP

Date

12-11-85

TO: (Name, office symbol, room number, building, Agency/Post)

Initials

Date

1. Edna Walton (8WM-DW)

EW

12/20/85

2. Regional Counsel - Andy Lensink

AL

12/23/85

3. Pat Crotty

Pat Crotty

12/20

4. Roger Frenette

RFR

12/23

5. Max Dodson (signatures)

not dated.

MD

12/26

Action	File	Note and Return
Approval	<input checked="" type="checkbox"/> For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	<input checked="" type="checkbox"/> Signature
Coordination	Justify	

REMARKS

FINAL PERMIT NO.: MTS21PR-0003
PERMITTEE: Century Oil & Gas Corp

PACKAGE #1

Left Side

Concurrence Sheet
Checklist - Final Action
~~Responsiveness Summary~~
Addendum to Statement of Basis (SOB)
Original SOB

PACKAGE #2

Left Side

Right Side

Cover Letter (SIGNATURE)
~~Aquifer Exemption (SIGN)~~
Final Action Document (SIGN)
Addendum to Statement of Basis

Right Side

Cover Letter
~~Aquifer Exemption (SIGN)~~
Action Document (SIGNATURE)

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No.—Bldg.

Bill Engle, Montana Office 8MO

Phone No.
FTS 585-5414

CONCURRENCES WITH UIC PROGRAM PERMITTING ACTION

DESCRIPTION OF PROPOSED ACTION: FINAL PERMIT FOR CENTURY OIL & GAS CORPORATION'S BOINGS #1 WELL (SWD#) ROSEVELT COUNTY, MT

As PERMIT WRITER, I certify that this action has been taken in accordance with all UIC Program regulations and guidance in force at this time; and that the attached checklist describes the major actions completed. EXCEPT AS FOLLOWS: DRAFT PERMIT WAS PUBLISHED 12/27/85, THEREFORE THE FORMAT IN USE AT THAT TIME WAS ALSO USED FOR THE FINAL PERMIT. IT WAS FELT THAT CHANGING TO THE NEW FORMAT MIGHT ALSO REQUIRE REPUBLISHING FOR
PUBLIC COMMENT

SIGNED: Charles J. Boyer DATE: 12/9/85

As DIRECT IMPLEMENTATION TEAM LEADER, I have reviewed this permit action to assure that the official file contains documentation indicative of a complete application and a thorough review. All checklists have been completed, the action is written in the format consistent with current guidance, and the content of the action is consistent with others of its type. EXCEPT AS FOLLOWS:

See Jim's explanation for format (Above)

SIGNED: W E Engh DATE: 12-11-85

As REVIEWING ATTORNEY, I have reviewed the administrative record (official file) and find that the proposed action is within the authority of the Water Management Division Director, and that the proposed action is both legally sound and enforceable. EXCEPT AS FOLLOWS:

SIGNED: Andrew J. Cronin DATE: 12/23/85

As GROUND WATER SECTION CHIEF, I certify that this action is consistent with UIC Program policy; and that the appropriate accountability systems have been adjusted to reflect this proposed action. EXCEPT AS FOLLOWS:

SIGNED: Robert J. Hae DATE: 12/20/85

As DRINKING WATER BRANCH CHIEF, I have reviewed the proposed action and find that it is consistent with UIC Program objectives. The exceptions noted above have been resolved, or do not create impediments. EXCEPT AS FOLLOWS:

SIGNED: _____ DATE: _____

As WATER MANAGEMENT DIVISION DIRECTOR, I have reviewed the findings of my staff and concur with them. I understand the exceptions noted by the Drinking Water Branch Chief, and am exercising my authority to approve this UIC Program permit action.

SIGNED: Max H. Nelson DATE: 12/26/85

FINAL PERMIT CONSIDERATIONS

A. THE FOLLOWING EVENTS HAVE TRANSPIRED SINCE THE DRAFT PERMIT WAS RELEASED:

YES / NO

<input checked="" type="checkbox"/>	<input type="checkbox"/>	Public notice published - Date: <u>12/27/84</u>
<input type="checkbox"/>	<input type="checkbox"/>	Copy of published notice received.
<input type="checkbox"/>	<input type="checkbox"/>	Affidavit of publication received.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Public comments received.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Applicant comments received.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Internal review comments received.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Response to public comments completed.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Public hearing held - Date: <u>5/29/85</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Final permit prepared.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Permit denial prepared.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Operator requested to Plug & Abandon existing well.

B. AS A RESULT OF PUBLIC COMMENTS, THE FOLLOWING CHANGES HAVE BEEN MADE TO THE DRAFT PERMIT:

NONE

C. AS A RESULT OF FURTHER REGIONAL & HQ REVIEW, THE FOLLOWING CHANGES HAVE BEEN MADE TO THE DRAFT PERMIT:

CONDITION 10: FLOW METER REQUIREMENT ADDED

*CONDITION 12: MIT TEST JUST COMPLETED, REWORK PERFORMED
REQUIRING SPECIAL MIT PROCEDURES BE ADDED,
ALSO REVISED MIT BOILER PLATE ADDED.*

CONDITION 21 REVISED TO REFLECT FINANCIAL RESPONSIBILITY DEMO.

D. AS A RESULT OF THE APPLICANT'S COMMENTS, THE FOLLOWING CHANGES HAVE BEEN MADE TO THE DRAFT PERMIT:

NONE

E. AS A RESULT OF THE PUBLIC HEARING: *NONE EXCEPT AS RESULTING
POLICY STATEMENT APPLIES TO THIS PERMIT
IN ALLOWING IT TO BE ISSUED.*

U. S. ENVIRONMENTAL PROTECTION AGENCY.
REGION VIII.

TRACKING SYSTEM FOR COMPLIANCE WITH.
UIC PERMIT SPECIAL CONDITIONS.

UIC PERMIT NO. MTB21PR-0003

WRITTEN BY: John Boyer

GOINGS #1 CENTURY OIL & GAS CORP.

PERMIT CONDITION NO. _____

ESTIMATED DATE DUE: _____

DESCRIPTION: _____

FOLLOW-UP NOTES: None

COMPLIANCE DATE: _____

(OR) ENFORCEMENT INITIATED DATE: _____

PERMIT CONDITION NO. _____

ESTIMATED DATE DUE: _____

DESCRIPTION: _____

FOLLOW-UP NOTES: _____

COMPLIANCE DATE: _____

(OR) ENFORCEMENT INITIATED DATE: _____

PERMIT CONDITION NO. _____

ESTIMATED DATE DUE: _____

DESCRIPTION: _____

FOLLOW-UP NOTES: _____

COMPLIANCE DATE: _____

(OR) ENFORCEMENT INITIATED DATE: _____

DATE ENTERED INTO COMPUTER TRACKING SYSTEM: _____

BY: _____

DESCRIPTION OF PROPOSED ACTION: DRAFT PERMIT FOR GOINGS #1 SWD WELL & DRAFT PERMIT
AND AQUIFER EXEMPTION FOR CLARK #1 SWD WELL - CENTURY OIL & GAS CORPORATION

As PERMIT WRITER, I certify that this action has been taken in accordance with all UIC Program regulations and guidance in force at this time; and that the attached checklist describes the major actions completed. EXCEPT AS FOLLOWS: _____

SIGNED: SEE ATTACHED SHEETS

DATE: _____

As DIRECT IMPLEMENTATION TEAM LEADER, I have reviewed this permit action to assure that the official file contains documentation indicative of a complete application and a thorough review. All checklists have been completed, the action is written in the format consistent with current guidance, and the content of the action is consistent with others of its type. EXCEPT AS FOLLOWS: A copy of P+A plan will be sent from MOO before this

draft permit is released (for Clark #1 Well) Done 1-14-85

SIGNED: [Signature]

DATE: 12/20/84

As REVIEWING ATTORNEY, I have reviewed the administrative record (official file) and find that the proposed action is within the authority of the Water Management Division Director, and that the proposed action is enforceable. EXCEPT AS FOLLOWS: _____

SIGNED: [Signature]

DATE: 01-10-85

As GROUND WATER SECTION CHIEF, I certify that this action is consistent with UIC Program policy; and that the appropriate accountability systems have been adjusted to reflect this proposed action. EXCEPT AS FOLLOWS: _____

SIGNED: [Signature]

DATE: 1-11-85

As DRINKING WATER BRANCH CHIEF, I have reviewed the proposed action and find that it is consistent with UIC Program objectives. The exceptions noted above have been resolved, or do not create impediments. EXCEPT AS FOLLOWS: _____

SIGNED: [Signature]

DATE: 1/15/85

As WATER MANAGEMENT DIVISION DIRECTOR, I have reviewed the findings of my staff and concur with them. I understand the exceptions noted by the Drinking Water Branch Chief, and am exercising my authority to approve this UIC Program permit action.

SIGNED: [Signature]

DATE: 1/16/85

STATEMENT OF BASIS

CENTURY OIL AND GAS CORPORATION

GOINGS #1, ROOSEVELT COUNTY, MONTANA

UIC PERMIT NUMBER MTS21PR-0003

CONTACTS:

Jim Boyter
U. S. Environmental Protection Agency
Montana Office
Federal Building, Drawer 10096
301 South Park
Helena, Montana 59626
Telephone: (406) 449-5486

Pat Crotty
U. S. Environmental Protection Agency
Region VIII
Ground Water Section
1860 Lincoln Street
Denver, Colorado 80295
Telephone: (303) 844-2731

DESCRIPTION OF FACILITY AND BACKGROUND INFORMATION

Century Oil and Gas Corporation will inject water into the Goings #1 from the Goings #27-3 and the Robins 22-15 wells producing from the Charles Formation. The Goings #1 has been injecting produced fluids into the Judith River Formation since March 23, 1982. A maximum of 900 barrels of produced fluid will be injected each day. There are no known drinking water wells within the area of review.

Century Oil and Gas Corporation has supplied all required information and data necessary for permit issuance in accordance with 40 CFR Parts 144, 146, and 147, and a draft permit has been prepared.

The permit will be issued for the operating life of the injection well, therefore, no reapplication will be necessary unless the permit is terminated for reasonable cause (40 CFR 144.39, 144.40, and 144.41). However, the permit will be reviewed every five years, and may be reopened at any time should allegations of endangerment arise.

This Statement of Basis gives the derivation of the site-specific permit conditions and reasons for them. The general permit conditions for which the content is mandatory and not subject to site-specific differences (based on 40 CFR Parts 144, 146, and 147), are not included in the following discussion.

MONITORING DEVICE

(Condition 11)

In order to allow a representative of EPA to inspect the well and take injection pressure measurements, we are requiring that the operator install a one-half inch fitting to: 1) the tubing, and 2) the tubing/casing annulus. In addition, a sampling tap shall be installed to allow for sampling of the injection fluid.

MECHANICAL INTEGRITY

(Condition 12)

The applicant did not submit a cement bond log. However, the cementing records submitted indicate adequate cement above the injection zone for the protection of USDW's.

INJECTION INTERVAL

(Condition 13)

The Judith River formation has been exempted in a 1/4 mile radius of the wellbore of the Goings #1 well as a USDW. The injection interval will be limited to this formation in the horizon between 1,028 feet and 1,116 feet where this well had been injecting approximately 400 barrels of salt water per day since March 1982 prior to the implementation of the UIC program in Montana.

INJECTION PRESSURE

(Condition 14)

Our files contain a record of a step rate test performed on March 20, 1982 when the subject well was completed as a salt water disposal well. The ISIP of 400 psi indicated and the formation breakdown pressure of 500 psi determined by us from the graphical presentation of the test appear to agree considering the friction loss in the 2-7/8 inch tubing used in the test. The test also indicates that an injection rate of 3,456 barrels of salt water per day was achieved with 500 psi injection pressure. The maximum injection pressure requested by the applicant was 700 psi which could initiate new fractures or propagate existing fractures in the confining zone and is, therefore, unacceptable. As the formation breakdown pressure will have increased with the increase in reservoir pressure since injection commenced in March 1982, the maximum injection pressure of 500 psi is considered safe.

INJECTION VOLUME-RATE LIMITATION

(Condition 15)

Current practice involves the injection of an average volume of 800 barrels per day, with a maximum volume of 900 barrels per day. The operator may continue to inject these volumes. However, at no time may the operator inject at a higher pressure than the maximum specified in Permit Condition 14 in order to maintain these volumes.

MONITORING REQUIREMENTS

(Condition 16)

The permittee is required to monitor water quality of the injection fluids at reasonable intervals. A water sample of injected fluids shall be analyzed for Total Dissolved Solids, major ions, and pH at quarterly intervals.

The permittee is also required to submit a comprehensive water quality analysis whenever the source of the injection fluid changes.

PLUGGING AND ABANDONMENT PLAN

(Condition 17, 18, 19 & 20)

The plugging and abandonment plan submitted by the applicant with the permit application is incorporated into the permit and shall be binding on the permittee. In addition, the requirement stating that the well should be abandoned in a state of static equilibrium was not addressed in the submitted Plugging and Abandonment Plan, that condition has been incorporated into the permit by reference. The minimum advance notice and post-plugging reporting requirements have been established.

FINANCIAL RESPONSIBILITY

(Condition 21 & 22)

The bond currently held by the applicant for plugging the well names the State of Montana as beneficiary, not EPA. EPA intends to deliver guidance to the permittee on the type, amount, and mechanism required by permittees to maintain Financial Responsibility in accordance with EPA policy. It is anticipated that this will be done during the public comment period. At that time, it will be necessary for the applicant to supply an acceptable demonstration. The permit to inject will not be issued until the applicant has submitted, and EPA has accepted, the required information showing that the applicant does have the resources to close, plug and abandon the injection well.

UIC PERMIT
CONCURRENCE SHEET

Permittee: CENTURY OIL & GAS CORP. UIC Permit No.: MTS21PR-0003

Expiration Date: NA

Permit Processor

Jim Boyter

Date: 12/5/84

Drafting Engineer

Jim Boyter

Date: 12/5/84

Chief, Groundwater Section

Date: _____

Chief, Drinking Water Branch

Date: _____

Regional Counsel

Date: _____

Director, Water Management Division

Date: _____

Public Notice Dated: _____

Comments:

**UIC PERMIT TECHNICAL
DEVELOPMENT CHECKLIST**

Permittee: CENTURY OIL & GAS CORP UIC Permit No.: MTS2/PR-0003

Type of Permit and Permit Action:

 Class I ☒ Class II Class III Class IV Class V
☒ New Permit Renewal Modification

Date application received: 7/30/84

Date application considered complete: ~~12/16/84~~ 12/3/84

Site visit in conjunction with permit action: Yes ☒ No

Date permit expires: N/A

--PERMIT CONDITIONS--

<u>N/A</u>	<u>Addressed</u>	<u>Included</u>	
<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	Construction Requirements (Pt. 146)
<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	Corrective Action
<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	Operation Requirements (Pt. 146)
<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	Requirements for HW Wells (Pt. 144.14)
<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	Monitoring and Reporting Requirements (Pt. 146)
<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	Plugging and Abandonment Plan
<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	Evidence of Financial Responsibility
<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	Demonstration of Mechanical Integrity
<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	Compliance Schedule

--APPLICABILITY TO OTHER FEDERAL ACTS--

<u>Comments Received</u>	<u>No Comments Received</u>	<u>Incorporated</u>	
<u> </u>	<u> </u>	<u> </u>	Wild and Scenic Rivers
<u> </u>	<u> </u>	<u> </u>	National Historic Preservation
<u> </u>	<u> </u>	<u> </u>	Endangered Species
<u> </u>	<u> </u>	<u> </u>	Fish and Wildlife
<u> </u>	<u> </u>	<u> </u>	Executive Orders
<u> </u>	<u> </u>	<u> </u>	NEPA

ADMINISTRATIVE RECORD CHECKLIST

Permittee: CENTURY OIL & GAS CORP UIC Permit No.: MTS21PR-0003

N/A	Included(I) or Available(A)	
—	<u>A</u>	Application
—	<u>I</u>	Draft Permit
—	<u>I</u>	Statement of Basis
<u>✓</u>	—	Fact Sheet
—	<u>A</u>	Supporting Documents Cited
—	<u>I</u>	Public Notice
—	<u>I</u>	Public Notice Mailing List
—	—	Affadavit of Publication for Pub. Notice
—	—	Copy of Notice
—	—	Public Comments
—	—	Response to Public Comments
—	—	Data from State Agencies used in Permit Decision
—	—	Coordination Completed with State
—	—	Public Hearing Record
—	—	Final Permit
—	—	Other (i.e. Appeal/Evidentiary Hearing)

Comments:

Draft or Final Permit plus
Aquifer Exemption (if applicable)



U.S. Environmental Protection Agency
Underground Injection Control Program

FINAL PERMIT

Class II Salt Water Disposal Well

Goings #1 Well

Permit # MTS21PR-0003

issued to:

Century Oil and Gas Corporation
7887 East Belleview Avenue
Englewood, Colorado 80111

Date Prepared: December 5, 1985

TABLE OF CONTENTS

PART I. GENERAL PERMIT CONDITIONS

	Page
A. Effect of Permit.....	4
B. Permit Actions.....	4
C. Severability.....	4
D. General Duties and Requirements.....	4
1. Duty to Comply.....	4
2. Need to Halt or Reduce Activity not a Defense.....	4
3. Duty to Mitigate.....	5
4. Proper Operation and Maintenance.....	5
5. Duty to Provide Information.....	5
6. Inspection and Entry.....	5
7. Records.....	5
8. Signatory Requirements.....	6
9. Reporting Requirements.....	6

PART II. SPECIFIC PERMIT CONDITIONS

E. Schedule for Compliance with Construction Requirements.....	8
10. Monitoring Device.....	8
11. Time for Compliance.....	8
F. Corrective Action.....	8
G. Well Operating and Monitoring Requirements.....	8
12. Mechanical Integrity.....	8
13. Injection Interval.....	9
14. Injection Pressure Limitation.....	9
15. Injection Volume Limitation.....	9
16. Monitoring Requirements.....	9
H. Plugging and Abandonment.....	10
17. Notice of Plugging and Abandonment.....	10
18. Plugging and Abandonment Plan.....	10
19. Cessation of Injection Activities.....	10
20. Plugging and Abandonment Report.....	10
I. Financial Responsibility.....	11
21. Financial Responsibility.....	11
22. Insolvency of Financial Institution.....	11
Attachment A (Plugging and Abandonment Plan).....	12
Attachment B (Downhole Schematic).....	14
Attachment C (Reporting Forms).....	16

FINAL UIC PERMIT

Permit Number: MTS21PR-0003

In compliance with provisions of the Safe Drinking Water Act, as amended, (40 U.S.C. 300f-300j-9, commonly known as SDWA) and attendant regulations incorporated by the U. S. Environmental Protection Agency under Title 40 of the Code of Federal Regulations,

Century Oil and Gas Corporation
7887 East Belleview Avenue
Englewood, Colorado 80111

is authorized to inject waste brine fluids into Goings #1, located in the NW quarter of Section 27, Township 29 N, Range 50 E of Roosevelt County, Montana, into the Judith River Formation, in accordance with conditions set forth herein. This permit does not constitute Bureau of Land Management (BLM) approval for subsurface injection. Applicant needs to contact BLM to determine if changes need to be made to the BLM permit.

All conditions set forth herein refer to Title 40 Parts 144, 146, and 147 of the Code of Federal Regulations and are regulations that are in effect on the date that this permit is effective.

This permit and the authorization to inject are issued for the operating life of the well but shall be reviewed at least every five years.

Signed and effective this 30th day of December, 1985



Max H. Dodson, Director
Water Management Division

PART I. GENERAL PERMIT CONDITIONS

A. EFFECT OF PERMIT

The permittee is allowed to engage in underground injection in accordance with the conditions of this permit. The underground injection activity, otherwise authorized by this permit or rule, shall not allow the movement of fluid containing any contaminant into underground sources of drinking water, if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 CFR Part 142 or otherwise adversely affect the health of persons. Any underground injection activity not authorized in this permit or otherwise authorized by permit or rule is prohibited. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any action brought under Section 1431 of the Safe Drinking Water Act (SDWA) or any other law governing protection of public health or the environment for any imminent and substantial endangerment to human health, or the environment, nor does it serve as a shield to the permittee's independent obligation to comply with all UIC regulations.

B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR Sections 144.39, 144.40, and 144.41. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the permittee does not stay the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

D. GENERAL DUTIES AND REQUIREMENTS

1. Duty to Comply. The permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance constitutes a violation of SDWA and is grounds for enforcement action, permit termination, revocation and reissuance, or modification.
2. Need to Halt or Reduce Activity not a Defense. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

3. Duty to Mitigate. The permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.
4. Proper Operation and Maintenance. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this permit.
5. Duty to Provide Information. The permittee shall furnish the Regional Administrator, within a time specified, any information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.
6. Inspection and Entry. The permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:
 - (a) Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records are kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
 - (d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by SDWA any substances or parameters at any location.
7. Records.
 - (a) The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit for a period of at least five (5) years from the date of the sample, measurement or report. The permittee shall maintain records of all data required to complete the permit

application and any supplemental information submitted for a period of three (3) years from the effective date of the permit. These periods may be extended by request of the Regional Administrator at any time.

(b) The permittee shall retain records concerning the nature and composition of all injected fluids until three (3) years after the completion of plugging and abandonment in accordance with the plugging and abandonment plan, Attachment A. The permittee shall continue to retain the records after the three year retention period unless he delivers the records to the Regional Administrator or obtains written approval from the Regional Administrator to discard the records.

(c) Records of monitoring information shall include:

- (i) The date, exact place, the time of sampling or measurements;
- (ii) The individual(s) who performed the sampling or measurements;
- (iii) The exact method(s) used to take samples;
- (iv) The date(s) analyses were performed;
- (v) The individual(s) who performed the analyses;
- (vi) The analytical techniques/methods and types of lab procedures used; and
- (vii) The results of such analyses.

8. Signatory Requirements. All reports or other information requested by the Regional Administrator shall be signed and certified according to 40 CFR 144.32.

9. Reporting Requirements.

(a) PLANNED CHANGES. The permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.

(b) ANTICIPATED NONCOMPLIANCE. The permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

(c) TRANSFERS. This permit is not transferrable to any person except after notice is sent to the Regional Administrator and the requirements of 40 CFR 144.38 are complied with. The Regional Administrator may require modification or revocation of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under SDWA.

- (d) COMPLIANCE SCHEDULES. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 30 days following each schedule date.
- (e) TWENTY-FOUR HOUR REPORTING.
 - (i) The permittee shall report to the Regional Administrator any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. The following shall be included as information which must be reported orally within 24 hours:
 - (a) Any monitoring or other information which indicates that any contaminant may cause endangerment to an underground source of drinking water.
 - (b) Any noncompliance with a permit condition or malfunction of the injection system which may cause fluid migration into or between underground sources of drinking water.
 - (ii) A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.
- (f) OTHER NONCOMPLIANCE. The permittee shall report all other instances of noncompliance not otherwise reported at the time monitoring reports are submitted. The reports shall contain the information listed in Permit Condition 9 (e)(ii).
- (g) OTHER INFORMATION. Where the permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the permittee shall submit such facts or information within 2 weeks of the time such information became known to him.
- (h) ANNUAL REPORT. The permittee shall submit an annual report to the Regional Administrator summarizing the results of the monitoring required by Permit Condition 16. All monthly records on injected fluids, and any major changes in characteristics or sources of injected fluid shall be included in the annual report. The first annual report shall cover the period from the effective date of the permit through December 31. Subsequently, the annual report shall cover the period of January 1 through December 31, and shall be submitted by February 15 of the following year.

PART II. SPECIFIC PERMIT CONDITIONS

E. SCHEDULE FOR COMPLIANCE

10. Monitoring Device. The operator shall provide and maintain in good operating condition:
- (a) a tap on the suction intake line upstream of the injection pump for the purposes of obtaining representative samples of the injection fluids, and
 - (b) two one-half (1/2) inch iron pipe size (IPS) female fittings with cut-off valves (one each on the injection tubing and on the tubing/casing annulus) so that a gauge having a one-half (1/2) male fitting can be attached to measure injection pressure.
 - (c) a flow meter with cumulative volume recorder that is certified for 5 percent accuracy throughout the range of injection rates allowed by the permit.
11. Time for Compliance. Compliance with Condition 10 must be obtained within 3 months of the effective date of the permit.

F. CORRECTIVE ACTION

The operator is not required to take any corrective action on any well within the area of review before the effective date of this permit.

G. WELL OPERATION AND MONITORING REQUIREMENTS

12. Mechanical Integrity.
- (a) METHOD OF DEMONSTRATING MECHANICAL INTEGRITY. A demonstration of the absence of significant leaks in the tubing must be made by performing a tubing pressure test. This test shall be conducted with a temporary tubing plug set at the bottom of the tubing and for a period of 45 minutes with a tubing pressure equal to the maximum injection pressure allowed by this permit. The tubing shall be filled with a non-corrosive fluid (either a non-toxic liquid or the injection fluid) with the temporary tubing plug in place at least 24 hours in advance of the test. Pressure values will be recorded at five minute intervals. This well passes the test if there is no more than a 10 percent decrease in pressure over the 45 minute period.
 - (b) SCHEDULE FOR DEMONSTRATIONS OF MECHANICAL INTEGRITY. A demonstration of mechanical integrity shall be made at regular intervals, no less frequently than every five (5) years from the effective date of this permit, in accordance with 40 CFR 146.8 and paragraph (a) above, unless otherwise modified. Initiation of mechanical integrity demonstrations will be according to the following provisions.

- (i) It shall be the permittee's responsibility to arrange and conduct the routine five-year demonstrations. The permittee shall notify the Director of his intent to demonstrate mechanical integrity at least thirty (30) days prior to each such demonstration. Results of the test shall be submitted to the Director as soon as possible but no later than sixty (60) days after the demonstration.
 - (ii) In addition to any demonstration made under paragraph (i) above, the Director may require a demonstration of mechanical integrity at any time during the permitted life of the well.
 - (c) **LOSS OF MECHANICAL INTEGRITY.** If the well fails to demonstrate mechanical integrity during a test, or a loss of mechanical integrity as defined by 40 CFR 146.8 becomes evident during operation, the permittee shall notify the Director in accordance with Part I, Section D. 9(e). of this permit. Furthermore, injection activities shall be terminated immediately; and operation shall not be resumed until the permittee has taken necessary actions to restore integrity to the well and EPA gives approval to recommence injection.
13. Injection Interval. Injection shall be limited to the Judith River Formation in the subsurface interval between 1,028 ft. and 1,116 ft.
14. Injection Pressure Limitation.
- (a) Injection pressure, measured at the surface, shall not exceed 500 pounds per square inch (psi).
 - (b) Injection at a pressure which initiates fractures in the confining zone or causes the movement of injection or formation fluids into an underground source of drinking water is prohibited.
15. Injection Volume-Rate Limitation. No more than 900 barrels per day of produced brine wastes shall be injected into this well provided further that in no case shall injection pressure exceed that limit shown in Condition 14 above.
16. Monitoring Requirements.
- (a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The permittee shall identify the types of tests and methods used to generate the monitoring data.
 - (b) Injection fluid analysis - the nature of injection fluids shall be monitored:

- (1) quarterly for Total Dissolved Solids, major ions and pH, and
 - (2) whenever there is a change in the source of injection fluids. A comprehensive water analysis equivalent to that submitted with the permit application shall be submitted to the Regional Administrator within 30 days of any change in injection fluids.
- (c) Injection pressure, flow rate and cumulative volume - Injection pressure, flow rate and cumulative volume shall be observed weekly. At least one observation of injection pressure, flow rate, and cumulative volume, shall be recorded at regular intervals no greater than 30 days apart.
- (d) The permittee may request that the frequency of analysis in paragraph (b)(1) above, be reduced after the first year if the reduced frequency will yield data representative of the nature of the injected fluids. The reduced frequency shall not be less than once per year.

H. PLUGGING AND ABANDONMENT

17. Notice of Plugging and Abandonment. The permittee shall notify the Regional Administrator 45 days before conversion or abandonment of the well.
18. Plugging and Abandonment Plan. The permittee shall plug and abandon the well as provided in the plugging and abandonment plan. See Attachment A.
19. Cessation of Injection Activities. After a cessation of operations of two years, the permittee shall plug and abandon the well in accordance with the Plugging & Abandonment Plan, unless he:
 - (a) provides notice to the Regional Administrator,
 - (b) demonstrates that the well will be used in the future, and
 - (c) describes actions or procedures, satisfactory to the Regional Administrator, that will be taken to ensure that the well will not endanger underground sources of drinking water during the period of temporary abandonment.
20. Plugging and Abandonment Report. Within 60 days after plugging the well, the permittee shall submit a report to the Regional Administrator. The report shall be certified as accurate by the person who performed the plugging operation and the report shall consist of either: (1) a statement that the well was plugged in accordance with the plan (see Condition 18); or (2) where actual plugging differed from the plan, specifying the different procedures used.

I. FINANCIAL RESPONSIBILITY

21. Demonstration of Financial Responsibility. The permittee is required to maintain financial responsibility and resources to close, plug and abandon the injection well as provided in the plugging and abandonment plan.
- (a) The letter of credit (# SC4185) in the amount of \$30,000 issued by the Colorado National Bank of Denver, Colorado which names EPA as beneficiary in the event of permittee default in the plugging and abandonment requirements, is hereby incorporated as part of this permit. The standby trust agreement established by the permittee shall remain in effect for the duration of this permit.
 - (b) The permittee may, upon written request to EPA, change the type of financial mechanism or instrument utilized. A change in demonstration of financial responsibility must be approved by the Director. A minor permit modification will be made to reflect any change in financial mechanisms, without further opportunity for public comment.
22. Insolvency of Financial Institution. The permittee must submit an alternative demonstration of financial responsibility acceptable to the Director, within sixty (60) days after either of the following events occur.
- (a) the institution issuing the trust or letter of credit files for bankruptcy; or
 - (b) the authority of the trustee institution to act as trustee, or the authority of the institution issuing the surety bond, is suspended or revoked.

ATTACHMENT A
Plugging and Abandonment Plan


 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 WASHINGTON, DC 20460

PLUGGING AND ABANDONMENT PLAN

NAME AND ADDRESS OF FACILITY

 Goings #1 SWDW
 NENW Section 27, T29N-R50E
 Roosevelt County, Montana

NAME AND ADDRESS OF OWNER/OPERATOR

 Century Oil & Gas Corporation
 7887 E. Bellevue Ave, Suite 800
 Englewood, CO 80111

 LOCATE WELL AND OUTLINE UNIT ON
 SECTION PLAT — 640 ACRES

STATE

MT

COUNTY

Roosevelt

PERMIT NUMBER

MTS21PR-0003

SURFACE LOCATION DESCRIPTION

NE 1/4 OF NW 1/4 OF 1/4 SECTION 27 TOWNSHIP 29N RANGE 50E

LOCATE WELL IN TWO DIRECTIONS FROM NEAREST LINES OF QUARTER SECTION AND DRILLING UNIT

Surface

Location 528 ft. from (N/S) Line of quarter section

and 2065 ft. from (E/W) Line of quarter section

TYPE OF AUTHORIZATION

- ☒ Individual Permit
☐ Area Permit
☐ Rul.

Number of Wells 1

WELL ACTIVITY

- ☐ CLASS I
☒ CLASS II
☒ Brine Disposal
☐ Enhanced Recovery
☐ Hydrocarbon Storage
☐ CLASS III

Lease Name Goings

Well Number 1

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT(LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
8-5/8	24	302	302	12-1/4
5 1/2	14	1186	1186	7-7/8
2 7/8	6.5	953	953	---

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- ☒ The Balance Method
☐ The Dump Bailer Method
☐ The Two-Plug Method
☐ Other

CEMENTING TO PLUG AND ABANDON DATA:

	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inches)	2 7/8						
Depth to Bottom of Tubing or Drill Pipe (ft.)	953						
Sacks of Cement To Be Used (each plug)	45						
Slurry Volume To Be Pumped (cu. ft.)	50						
Calculated Top of Plug (ft.)	Surface						
Measured Top of Plug (if tagged ft.)	Surface						
Slurry Wt. (Lb./Gal.)	15.8						
Type Cement or Other Material (Class III)	Class G						

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (If any)

From	To	From	To
1028	1038		
1080	1096		
1108	1116		

Estimated Cost to Plug Wells

\$5,000

CERTIFICATION

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR 144.32)

NAME AND OFFICIAL TITLE (Please type or print)

 Jack B. McWilliams
 Vice President, Production

SIGNATURE

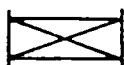
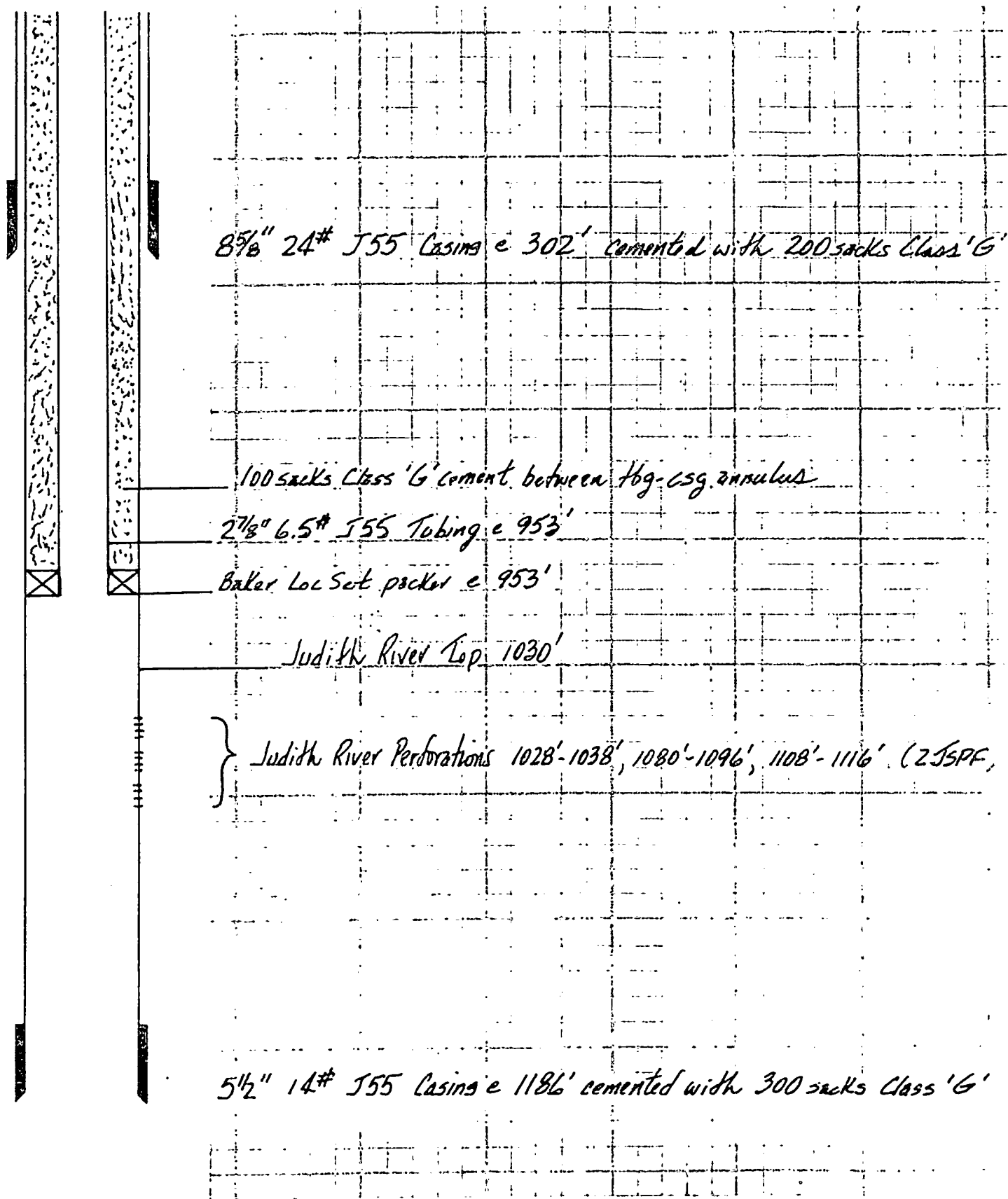
DATE SIGNED

12/5/85

ATTACHMENT B
Downhole Schematic

WELLBORE DIAGRAM

DATE 12/5/85 WELL NO. #1 SWD LEASE Goings FIELD NW Poplar



BRIDGE PLUG



PACKER



CENTRALIZER



SCRATCHER



BASKET



PERFORATIC

ATTACHMENT C
Reporting Forms

1. EPA Form 7520- 7: APPLICATION TO TRANSFER PERMIT
2. EPA Form 7520-10: COMPLETION REPORT FOR BRINE DISPOSAL ... WELL
3. EPA Form 7520-11: ANNUAL DISPOSAL/INJECTION WELL MONITORING REPORT
4. EPA Form 7520-12: WELL REWORK RECORD
5. EPA Form 7520-13: PLUGGING RECORD

APPLICATION TO TRANSFER PERMIT

NAME AND ADDRESS OF SURFACE OWNER

PERMIT NUMBER

RANGE

and ____ ft. from (E/W) ____ Line of quarter section

TYPE OF PERMIT

- ☐ Individual
☐ Area
 Number of Wells _____

Well Number

NAME AND ADDRESS OF NEW OPERATOR.

DATE SIGNED

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460Form Approved
OMB No. 2040-0042
Approval expires 9-30-86**COMPLETION REPORT FOR BRINE DISPOSAL,
HYDROCARBON STORAGE, OR ENHANCED RECOVERY WELL**

NAME AND ADDRESS OF EXISTING PERMITTEE

NAME AND ADDRESS OF SURFACE OWNER

LOCATE WELL AND OUTLINE UNIT ON
SECTION PLAT — 840 ACRES

N									
S									
W					E				

STATE

COUNTY

PERMIT NUMBER

SURFACE LOCATION DESCRIPTION

1/4 OF

1/4 OF

1/4 SECTION

TOWNSHIP

RANGE

LOCATE WELL IN TWO DIRECTIONS FROM NEAREST LINES OF QUARTER SECTION AND DRILLING UNIT

Surface

Location _____ ft. from (N/S) _____ Line of quarter section

and _____ ft. from (E/W) _____ Line of quarter section

WELL ACTIVITY

- ☐
- Brine Disposal
-
- ☐
- Enhanced Recovery
-
- ☐
- Hydrocarbon Storage

TYPE OF PERMIT

- ☐
- Individual
-
- ☐
- Area

Number of Wells _____

Estimated Fracture Pressure
of Injection Zone

Anticipated Daily Injection Volume (Bbls)

Injection Interval

Average

Maximum

Feet

to Feet

Anticipated Daily Injection Pressure (PSI)

Depth to Bottom of Lowermost Freshwater Formation
(Feet)

Average

Maximum

Type of Injection Fluid (Check the appropriate block(s))

- ☐
- Salt Water
-
- ☐
- Brackish Water
-
- ☐
- Fresh Water
-
- ☐
- Liquid Hydrocarbon
-
- ☐
- Other

Lease Name

Well Number

Name of Injection Zone

Date Drilling Began

Date Well Completed

Permeability of Injection Zone

Date Drilling Completed

Porosity of Injection Zone

CASING AND TUBING

CEMENT

HOLE

OD Size

Wt/Ft — Grade — New or Used

Depth

Sacks

Class

Depth

Bit Diameter

INJECTION ZONE STIMULATION

WIRE LINE LOGS, LIST EACH TYPE

Interval Treated

Materials and Amount Used

Log Types

Logged Intervals

Complete Attachments A — E listed on the reverse.

CERTIFICATION

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR 144.32).

NAME AND OFFICIAL TITLE (Please type or print)

DATE SIGNED

ANNUAL DISPOSAL/INJECTION WELL MONITORING REPORT

NAME AND ADDRESS OF SURFACE OWNER

PERMIT NUMBER

RANGE

Well Number

MAXIMUM PSIG

DATE SIGNED _____



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

WELL REWORK RECORD

NAME AND ADDRESS OF PERMITTEE

NAME AND ADDRESS OF CONTRACTOR

LOCATE WELL AND OUTLINE UNIT ON
SECTION PLAT — 640 ACRES

N					
S					

W E

STATE

COUNTY

PERMIT NUMBER

SURFACE LOCATION DESCRIPTION

1/4 OF

1/4 OF

1/4 SECTION

TOWNSHIP

RANGE

LOCATE WELL IN TWO DIRECTIONS FROM NEAREST LINES OF QUARTER SECTION AND DRILLING UNIT

Surface

Location ____ ft. from (N/S) ____ Line of quarter section

and ____ ft. from (E/W) ____ Line of quarter section

WELL ACTIVITY

- ☐ Brine Disposal
☐ Enhanced Recovery
☐ Hydrocarbon Storage

Lease Name

Total Depth Before Rework

Total Depth After Rework

Date Rework Commenced

Date Rework Completed

TYPE OF PERMIT

- ☐ Individual
☐ Area
Number of Wells ____

Well Number

WELL CASING RECORD — BEFORE REWORK

Casing		Cement		Perforations		Acid or Fracture Treatment Record
Size	Depth	Sacks	Type	From	To	

WELL CASING RECORD — AFTER REWORK (Indicate Additions and Changes Only)

Casing		Cement		Perforations		Acid or Fracture Treatment Record
Size	Depth	Sacks	Type	From	To	

DESCRIBE REWORK OPERATIONS IN DETAIL
USE ADDITIONAL SHEETS IF NECESSARY

WIRE LINE LOGS, LIST EACH TYPE

Log Types

Logged Intervals

CERTIFICATION

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR 144.32).

NAME AND OFFICIAL TITLE (Please type or print)

SIGNATURE

DATE SIGNED


 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 WASHINGTON, DC 20460

PLUGGING RECORD

NAME AND ADDRESS OF PERMITTEE

NAME AND ADDRESS OF CEMENTING COMPANY

 LOCATE WELL AND OUTLINE UNIT ON
 SECTION PLAT — 640 ACRES

STATE

COUNTY

PERMIT NUMBER

SURFACE LOCATION DESCRIPTION

1/4 OF

1/4 OF

1/4 SECTION

TOWNSHIP

RANGE

LOCATE WELL IN TWO DIRECTIONS FROM NEAREST LINES OF QUARTER SECTION AND DRILLING UNIT

Surface

Location _____ ft. from (N/S) _____ Line of quarter section

and _____ ft. from (E/W) _____ Line of quarter section

TYPE OF PERMIT

- ☐ Individual
☐ Area

Number of Wells

 Describe in detail the manner in which the fluid was placed and
 the method used in introducing it into the hole

CASING AND TUBING RECORD AFTER PLUGGING

WELL ACTIVITY

 METHOD OF EMPLACEMENT OF
 CEMENT PLUGS

SIZE	WT(LB/FT)	PUT IN WELL (FT)	LEFT IN WELL (FT)	MOLE SIZE

- ☐ Brine Disposal
☐ Enhanced Recovery
☐ Hydrocarbon Storage

- ☐ The Balance Method
☐ The Dump Bailer Method
☐ The Two-Plug Method

Lease Name

Well Number

CEMENTING TO PLUG AND ABANDON DATA

PLUG #1

PLUG #2

PLUG #3

PLUG #4

PLUG #5

PLUG #6

PLUG #7

Cementing Date

Size of Hole or Pipe in which Plug Placed (inches)

Depth to Bottom of Tubing or Drill Pipe (ft.)

Sacks of Cement Used (each plug)

Slurry Volume Pumped (cu. ft.)

Calculated Top of Plug (ft.)

Measured Top of Plug (if tagged ft.)

Slurry Wt. (LB/Gal)

Type Cement

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS

From

To

From

To

Signature of Cementer or Authorized Representative

Signature of EPA Representative

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (Ref. 40 CFR 122.22).

NAME AND OFFICIAL TITLE (Please type or print)

SIGNATURE

DATE SIGNED

ADDENDUM

STATEMENT OF BASIS

CENTURY OIL AND GAS CORPORATION

GOINGS #1, ROOSEVELT COUNTY, MONTANA

UIC PERMIT NUMBER MTS21PR-0003

EPA held a hearing on May 29, 1985, upon request of the Fort Peck Tribes, to gather factual information regarding the hydrogeologic characteristics of the Judith River Formation, and to allow comments to be heard concerning our intent to issue this permit. This well is one of several disposal wells injecting fluid into the Judith River Formation, which the Tribe had requested to be protected as an underground source of drinking water (USDW). This well was injecting prior to the inception of the UIC program (June 25, 1984), and is therefore authorized by rule. As a result of the public hearing and a subsequent technical evaluation of the testimony presented at the hearing, EPA has prepared a statement which establishes EPA's policy on permitting existing and future wells that inject into the Judith River Formation on the Fort Peck Reservation. The issuance of the final permit for this injection well, the Goings #1, is in compliance with that policy.

The draft permit for the Goings #1 Well was published on December 27, 1984. Since that publication this well failed a mechanical integrity test on September 25, 1985, was reworked to remedy the casing leak, and subsequently passed a retesting of mechanical integrity on October 13, 1985.

The following three conditions are being revised. The first one is revised as a result of administrative revision within the UIC program since publication of the draft permit; the second as a result of the administrative revisions plus the specific rework program performed on the well; and the third as a result of Century's fulfillment of the financial responsibility requirements.

Monitoring Device

(Condition 10)

In order to allow a representative of EPA to take injection pressure measurements, EPA is requiring that the permittee install one-half inch fittings with cut-off valves on the tubing and on the casing-tubing annulus. In addition, a sampling tap will be installed and used to collect a representative grab sample for analytical purposes. Also, the permittee is required to install a flow meter with cumulative volume recorder to accomplish required monitoring.

Mechanical Integrity

(Condition 12)

This permit condition was revised to reflect the recent successful mechanical integrity test and to describe the method of demonstrating mechanical integrity to be used in the future as necessitated by the rework program which consisted of cementing the tubing/casing annulus to surface, the subsequent mechanical integrity test requirements, and requirements in the event of loss of mechanical integrity.

Financial Responsibility

(Condition 21)

The applicant submitted a irrevocable standby letter of credit (Number SC-4185) from Colorado National Bank of Denver in the amount of \$30,000; and a Standby Trust Agreement with the Colorado National Bank of Denver to provide appropriate coverage for the Goings #1 Well and two other wells in the State of Montana and, thereby, satisfy EPA's financial responsibility requirements. The permit includes provisions for requiring alternative financial responsibility demonstration in the event that the issuing institution of the letter of credit or trust becomes insolvent, or the authority of a trustee or institution used in the financial responsibility demonstration is suspended or revoked.

U.S. Environmental Protection Agency
Underground Injection Control Program

DRAFT PERMIT

Class II Salt Water Disposal Well

Going #1 Well
Permit # MTS21PR-0003

issued to:

Century Oil and Gas Corporation
7887 East Belleview Avenue
Englewood, Colorado 80111

Date Prepared: December 18, 1984



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
1860 LINCOLN STREET
DENVER, COLORADO 80295-0699

DRAFT UIC PERMIT

Permit Number: MTS21PR-0003

In compliance with provisions of the Safe Drinking Water Act, as amended, (40 U.S.C. 300f-300j-9, commonly known as SDWA) and attendant regulations incorporated by the U. S. Environmental Protection Agency under Title 40 of the Code of Federal Regulations,

Century Oil and Gas Corporation
7887 East Belleview Avenue
Englewood, Colorado 80111

is authorized to inject waste brine fluids into Goings #1, located in the NW quarter of Section 27, Township 29 N, Range 50 E of Roosevelt County, Montana, into the Judith River Formation, in accordance with conditions set forth herein. This permit does not constitute Bureau of Land Management (BLM) approval for subsurface injection. Applicant needs to contact BLM to determine if changes need to be made to the BLM permit.

All conditions set forth herein refer to Title 40 Parts 144, 146, and 147 of the Code of Federal Regulations and are regulations that are in effect on the date that this permit is effective.

This permit and the authorization to inject are issued for the operating life of the well but shall be reviewed at least every five years.

Signed and effective this _____ day of _____, 1984

Max H. Dodson, Director
Water Management Division

TABLE OF CONTENTS

Underground Injection Control Permit Number MTS21PR-0003

PART I: GENERAL PERMIT CONDITIONS

	Page
A. Effect of Permit.....	1
B. Permit Actions.....	1
C. Severability.....	1
D. General Duties and Requirements.....	1
1. Duty to Comply.....	2
2. Need to Halt or Reduce Activity not a Defense.....	2
3. Duty to Mitigate.....	2
4. Proper Operation and Maintenance.....	2
5. Duty to Provide Information.....	2
6. Inspection and Entry.....	2
7. Records.....	2
8. Signatory Requirements.....	3
9. Reporting Requirements.....	3

PART II: SPECIFIC PERMIT CONDITIONS

E. Schedule for Compliance with Construction Requirements.....	5
10. Monitoring Device.....	5
11. Time for Compliance.....	5
F. Corrective Action.....	5
G. Well Operating and Monitoring Requirements.....	5
12. Mechanical Integrity.....	5
13. Injection Interval.....	6
14. Injection Pressure Limitation.....	6
15. Injection Volume Limitation.....	6
16. Monitoring Requirements.....	6
H. Plugging and Abandonment.....	6
17. Notice of Plugging and Abandonment.....	6
18. Plugging and Abandonment Plan.....	7
19. Cessation of Injection Activities.....	7
20. Plugging and Abandonment Report.....	7
I. Financial Responsibility.....	7
21. Financial Responsibility.....	7
22. Insolvency of Financial Institution.....	7

Attachment A (Plugging and Abandonment Plan)
Attachment B (Downhole Schematic)
Attachment C (Reporting Forms)

PART I. GENERAL PERMIT CONDITIONS

A. EFFECT OF PERMIT

The permittee is allowed to engage in underground injection in accordance with the conditions of this permit. The underground injection activity, otherwise authorized by this permit or rule, shall not allow the movement of fluid containing any contaminant into underground sources of drinking water, if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 CFR Part 142 or otherwise adversely affect the health of persons. Any underground injection activity not authorized in this permit or otherwise authorized by permit or rule is prohibited. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any action brought under Section 1431 of the Safe Drinking Water Act (SDWA) or any other law governing protection of public health or the environment for any imminent and substantial endangerment to human health, or the environment, nor does it serve as a shield to the permittee's independent obligation to comply with all UIC regulations.

B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR Sections 144.39, 144.40, and 144.41. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the permittee does not stay the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

D. GENERAL DUTIES AND REQUIREMENTS

1. Duty to Comply. The permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance constitutes a violation of SDWA and is grounds for enforcement action, permit termination, revocation and reissuance, or modification.
2. Need to Halt or Reduce Activity not a Defense. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

3. Duty to Mitigate. The permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.
4. Proper Operation and Maintenance. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this permit.
5. Duty to Provide Information. The permittee shall furnish the Regional Administrator, within a time specified, any information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.
6. Inspection and Entry. The permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:
 - (a) Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records are kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
 - (d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by SDWA any substances or parameters at any location.
7. Records.
 - (a) The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit for a period of at least five (5) years from the date of the sample, measurement or report. The permittee shall maintain records of all data required to complete the permit

application and any supplemental information submitted for a period of three (3) years from the effective date of the permit. These periods may be extended by request of the Regional Administrator at any time.

- (b) The permittee shall retain records concerning the nature and composition of all injected fluids until three (3) years after the completion of plugging and abandonment in accordance with the plugging and abandonment plan, Attachment A. The permittee shall continue to retain the records after the three year retention period unless he delivers the records to the Regional Administrator or obtains written approval from the Regional Administrator to discard the records.
- (c) Records of monitoring information shall include:
 - (i) The date, exact place, the time of sampling or measurements;
 - (ii) The individual(s) who performed the sampling or measurements;
 - (iii) The exact method(s) used to take samples;
 - (iv) The date(s) analyses were performed;
 - (v) The individual(s) who performed the analyses;
 - (vi) The analytical techniques/methods and types of lab procedures used; and
 - (vii) The results of such analyses.

8. Signatory Requirements. All reports or other information requested by the Regional Administrator shall be signed and certified according to 40 CFR 144.32.

9. Reporting Requirements.

- (a) PLANNED CHANGES. The permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.
- (b) ANTICIPATED NONCOMPLIANCE. The permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.
- (c) TRANSFERS. This permit is not transferrable to any person except after notice is sent to the Regional Administrator and the requirements of 40 CFR 144.38 are complied with. The Regional Administrator may require modification or revocation of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under SDWA.

- (d) COMPLIANCE SCHEDULES. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 30 days following each schedule date.
- (e) TWENTY-FOUR HOUR REPORTING.
 - (i) The permittee shall report to the Regional Administrator any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. The following shall be included as information which must be reported orally within 24 hours:
 - (a) Any monitoring or other information which indicates that any contaminant may cause endangerment to an underground source of drinking water.
 - (b) Any noncompliance with a permit condition or malfunction of the injection system which may cause fluid migration into or between underground sources of drinking water.
 - (ii) A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.
- (f) OTHER NONCOMPLIANCE. The permittee shall report all other instances of noncompliance not otherwise reported at the time monitoring reports are submitted. The reports shall contain the information listed in Permit Condition 9 (e)(ii).
- (g) OTHER INFORMATION. Where the permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the permittee shall submit such facts or information within 2 weeks of the time such information became known to him.
- (h) ANNUAL REPORT. The permittee shall submit an annual report to the Regional Administrator summarizing the results of the monitoring required by Permit Condition 16. All monthly records on injected fluids, and any major changes in characteristics or sources of injected fluid shall be included in the annual report. The first annual report shall cover the period from the effective date of the permit through December 31. Subsequently, the annual report shall cover the period of January 1 through December 31, and shall be submitted by February 15 of the following year.

PART II. SPECIFIC PERMIT CONDITIONS

E. SCHEDULE FOR COMPLIANCE

10. Monitoring Device. The operator shall provide and maintain in good operating condition:

- (a) a tap on tubing for the purposes of obtaining representative samples of the injection fluids, and
- (b) two one-half (1/2) inch iron pipe size (IPS) female fittings with cut-off valves (one each on the injection tubing and on the tubing/casing annulus) so that a gauge having a one-half (1/2) male fitting can be attached to measure injection pressure.

11. Time for Compliance. Compliance with Condition 10 must be obtained within 3 months of the effective date of the permit.

F. CORRECTIVE ACTION

The operator is not required to take any corrective action on any well within the area of review before the effective date of this permit.

G. WELL OPERATION AND MONITORING REQUIREMENTS

12. Mechanical Integrity.

- (a) INITIAL DEMONSTRATION. Injection operations are prohibited until the permittee demonstrates that the well covered by this permit has mechanical integrity in accordance with 40 CFR 146.8 and the permittee has received notice from the Regional Administrator that such a demonstration is satisfactory.
- (b) SUBSEQUENT DEMONSTRATION. A demonstration of mechanical integrity in accordance with 40 CFR 146.8 shall be made every five years from the effective date of this permit. The permittee shall notify the Regional Administrator of his intent to demonstrate mechanical integrity at least 30 days prior to such scheduled demonstration. Results of the test shall be submitted to the Regional Administrator as soon as possible but no later than 60 days after the demonstration. The permittee may continue operations only if the well has demonstrated mechanical integrity, otherwise injection activities shall be halted.

(c) Mechanical integrity tests shall be performed using noncorrosive fluids consisting of either fresh water or corrosion inhibited formation fluid from the production zone.

13. Injection Interval. Injection shall be limited to the Judith River Formation in the subsurface interval between 1,028 ft. and 1,116 ft.

14. Injection Pressure Limitation.

(a) Injection pressure, measured at the surface, shall not exceed 500 pounds per square inch (psi).

(b) Injection at a pressure which initiates fractures in the confining zone or causes the movement of injection or formation fluids into an underground source of drinking water is prohibited.

15. Injection Volume-Rate Limitation. The volume-rate of produced brine wastes to be injected into the well will be limited to 900 barrels per day.

16. Monitoring Requirements.

(a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The permittee shall identify the types of tests and methods used to generate the monitoring data.

(b) Injection fluid analysis - the nature of injection fluids shall be monitored:

- (1) quarterly for Total Dissolved Solids, major ions and pH, and
- (2) whenever there is a change in the source of injection fluids. A comprehensive water analysis equivalent to that submitted with the permit application shall be submitted to the Regional Administrator within 30 days of any change in injection fluids.

(c) Injection pressure, flow rate and cumulative volume - Injection pressure, flow rate and cumulative volume shall be observed weekly. At least one observation of injection pressure, flow rate, and cumulative volume, shall be recorded at regular intervals no greater than 30 days apart.

H. PLUGGING AND ABANDONMENT

17. Notice of Plugging and Abandonment. The permittee shall notify the Regional Administrator 45 days before conversion or abandonment of the well.

18. Plugging and Abandonment Plan. The permittee shall plug and abandon the well as provided in the plugging and abandonment plan. See Attachment A. Permittee will abandon the well in a state of static equilibrium with mud weight equalized top to bottom in accordance with 40 CFR Section 146.10(c).
19. Cessation of Injection Activities. After a cessation of operations of two years, the permittee shall plug and abandon the well in accordance with the Plugging & Abandonment Plan, unless he:
 - (a) provides notice to the Regional Administrator,
 - (b) demonstrates that the well will be used in the future, and
 - (c) describes actions or procedures, satisfactory to the Regional Administrator, that will be taken to ensure that the well will not endanger underground sources of drinking water during the period of temporary abandonment.
20. Plugging and Abandonment Report. Within 60 days after plugging the well, the permittee shall submit a report to the Regional Administrator. The report shall be certified as accurate by the person who performed the plugging operation and the report shall consist of either: (1) a statement that the well was plugged in accordance with the plan (see Condition 18); or (2) where actual plugging differed from the plan, specifying the different procedures used.

I. FINANCIAL RESPONSIBILITY

21. The permittee is required to maintain financial responsibility and resources to close, plug and abandon the injection well as provided in the plugging and abandonment plan. The permittee must show evidence of financial responsibility acceptable to the Regional Administrator before injection operation is authorized under this permit.
22. Insolvency of Financial Institution. In the event of the bankruptcy of the trustee or issuing institution, if one is utilized, of the financial mechanism, or a suspension or revocation of the authority of the trustee institution to act as trustee or the institution issuing the financial mechanism to issue such an instrument, the permittee must submit an alternative demonstration of financial responsibility acceptable to the Regional Administrator within 60 days after such event.

ATTACHMENT A
(Plugging & Abandonment Plan)

ATTACHMENT B
(Construction Details)

ATTACHMENT C
(Reporting Forms)

Public Participation
Statement of Basis

STATEMENT OF BASIS
CENTURY OIL AND GAS CORPORATION
GOINGS #1, ROOSEVELT COUNTY, MONTANA
UIC PERMIT NUMBER MTS21PR-0003

CONTACTS:

Jim Boyter
U. S. Environmental Protection Agency
Montana Office
Federal Building, Drawer 10096
301 South Park
Helena, Montana 59626
Telephone: (406) 449-5486

Pat Crotty
U. S. Environmental Protection Agency
Region VIII
Ground Water Section
1860 Lincoln Street
Denver, Colorado 80295
Telephone: (303) 844-2731

DESCRIPTION OF FACILITY AND BACKGROUND INFORMATION

Century Oil and Gas Corporation will inject water into the Goings #1 from the Goings #27-3 and the Robins 22-15 wells producing from the Charles Formation. The Goings #1 has been injecting produced fluids into the Judith River Formation since March 23, 1982. A maximum of 900 barrels of produced fluid will be injected each day. There are no known drinking water wells within the area of review.

Century Oil and Gas Corporation has supplied all required information and data necessary for permit issuance in accordance with 40 CFR Parts 144, 146, and 147, and a draft permit has been prepared.

The permit will be issued for the operating life of the injection well, therefore, no reapplication will be necessary unless the permit is terminated for reasonable cause (40 CFR 144.39, 144.40, and 144.41). However, the permit will be reviewed every five years, and may be reopened at any time should allegations of endangerment arise.

This Statement of Basis gives the derivation of the site-specific permit conditions and reasons for them. The general permit conditions for which the content is mandatory and not subject to site-specific differences (based on 40 CFR Parts 144, 146, and 147), are not included in the following discussion.

MONITORING DEVICE

(Condition 11)

In order to allow a representative of EPA to inspect the well and take injection pressure measurements, we are requiring that the operator install a one-half inch fitting to: 1) the tubing, and 2) the tubing/casing annulus.

MECHANICAL INTEGRITY

(Condition 12)

The applicant did not submit a cement bond log. However, the cementing records submitted indicates adequate cement above the injection zone for the protection of USDW's.

INJECTION INTERVAL

(Condition 13)

The Judith River formation has been exempted in a 1/4 mile radius of the wellbore of the Goings #1 well as a USDW. The injection interval will be limited to this formation in the horizon between 1,028 feet and 1,116 feet where this well had been injecting approximately 400 barrels of salt water per day since March 1982 prior to the implementation of the UIC program in Montana.

INJECTION PRESSURE

(Condition 14)

Our files contain a record of a step rate test performed on March 20, 1982 when the subject well was completed as a salt water disposal well. The ISIP of 400 psi indicated and the formation breakdown pressure of 500 psi determined by us from the graphical presentation of the test appear to agree considering the friction loss in the 2-7/8 inch tubing used in the test. The test also indicates that an injection rate of 3,456 barrels of salt water per day was achieved with 500 psi injection pressure. The maximum injection pressure requested by the applicant was 700 psi which could initiate new fractures or propagate existing fractures in the confining zone and is, therefore, unacceptable. As the formation breakdown pressure will have increased with the increase in reservoir pressure since injection commenced in March 1982, the maximum injection pressure of 500 psi is considered safe.

INJECTION VOLUME LIMITATION

(Condition 15)

Current practice involves the injection of an average volume of 800 barrels per day, with a maximum volume of 900 barrels per day. The operator may continue to inject these volumes. However, at no time may the operator inject at a higher pressure than the maximum specified in Permit Condition 14 in order to maintain these volumes.

MONITORING REQUIREMENTS

(Condition 16)

The permittee is required to monitor water quality of the injection fluids at reasonable intervals. A water sample of injected fluids shall be analyzed for Total Dissolved Solids, major ions, and pH at quarterly intervals.

The permittee is also required to submit a comprehensive water quality analysis whenever the source of the injection fluid changes.

PLUGGING AND ABANDONMENT PLAN

(Condition 18)

The plugging and abandonment plan submitted by the applicant with the permit application is incorporated into the permit and shall be binding on the permittee. In addition, the requirement stating that the well should be abandoned in a state of static equilibrium was not addressed in the submitted Plugging and Abandonment Plan, that condition has been incorporated into the permit by reference.

FINANCIAL RESPONSIBILITY

(Condition 20)

The bond currently held by the applicant for plugging the well names the State of Montana as beneficiary, not EPA. EPA intends to deliver guidance to the permittee on the type, amount, and mechanism required by permittees to maintain Financial Responsibility in accordance with EPA policy. It is anticipated that this will be done in the next two (2) weeks. At that time, it will be necessary for the applicant to supply the acceptable information. The permit to inject will not be issued until the applicant has submitted, and EPA has accepted, the required information showing that the applicant does have the resources to close, plug and abandon the injection well.

ADDENDUM

STATEMENT OF BASIS

CENTURY OIL AND GAS CORPORATION

GOINGS #1, ROOSEVELT COUNTY, MONTANA

UIC PERMIT NUMBER MTS21PR-0003

EPA held a hearing on May 29, 1985, upon request of the Fort Peck Tribes, to gather factual information regarding the hydrogeologic characteristics of the Judith River Formation, and to allow comments to be heard concerning our intent to issue this permit. This well is one of several disposal wells injecting fluid into the Judith River Formation, which the Tribe had requested to be protected as an underground source of drinking water (USDW). This well was injecting prior to the inception of the UIC program (June 25, 1984), and is therefore authorized by rule. As a result of the public hearing and a subsequent technical evaluation of the testimony presented at the hearing, EPA has prepared a statement which establishes EPA's policy on permitting existing and future wells that inject into the Judith River Formation on the Fort Peck Reservation. The issuance of the final permit for this injection well, the Goings #1, is in compliance with that policy.

The draft permit for the Goings #1 Well was published on December 27, 1984. Since that publication this well failed a mechanical integrity test on September 25, 1985, was reworked to remedy the casing leak, and subsequently passed a retesting of mechanical integrity on October 13, 1985.

The following three conditions are being revised. The first one is revised as a result of administrative revision within the UIC program since publication of the draft permit; the second as a result of the administrative revisions plus the specific rework program performed on the well; and the third as a result of Century's fulfillment of the financial responsibility requirements.

Monitoring Device

(Condition 10)

In order to allow a representative of EPA to take injection pressure measurements, EPA is requiring that the permittee install one-half inch fittings with cut-off valves on the tubing and on the casing-tubing annulus. In addition, a sampling tap will be installed and used to collect a representative grab sample for analytical purposes. Also, the permittee is required to install a flow meter with cumulative volume recorder to accomplish required monitoring.

Mechanical Integrity

(Condition 12)

This permit condition was revised to reflect the recent successful mechanical integrity test and to describe the method of demonstrating mechanical integrity to be used in the future as necessitated by the rework program which consisted of cementing the tubing/casing annulus to surface, the subsequent mechanical integrity test requirements, and requirements in the event of loss of mechanical integrity.

Financial Responsibility

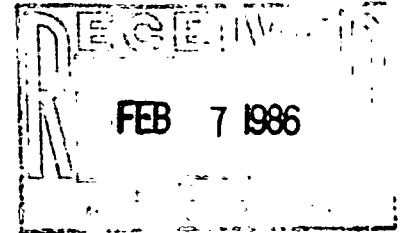
(Condition 21)

The applicant submitted a irrevocable standby letter of credit (Number SC-4185) from Colorado National Bank of Denver in the amount of \$30,000; and a Standby Trust Agreement with the Colorado National Bank of Denver to provide appropriate coverage for the Goings #1 Well and two other wells in the State of Montana and, thereby, satisfy EPA's financial responsibility requirements. The permit includes provisions for requiring alternative financial responsibility demonstration in the event that the issuing institution of the letter of credit or trust becomes insolvent, or the authority of a trustee or institution used in the financial responsibility demonstration is suspended or revoked.

Robert A. Zimmerman
Box 1081
Wolf Point, MT 59201

January 29, 1986

Environmental Protection Agency
Region VIII
Drinking Water Branch SWH-LW
1 Denver Place, Suite 1300
999-15th Street
Denver, CO 80202-2413



Dear Lebra Ehlert,

In our opinion, the EPA is making an unwise decision by allowing oil companies to inject their salt water and drilling fluids into the Judith River formation here on the Fort Peck Reservation in eastern Montana. It seems so contrary to EPA's past decisions and philosophy to protect the public and their domain.

Roosevelt County, farmers and ranchers, the Land and Mineral Owners Association, and the Fort Peck Indian Agency are on record as opposing any Judith River injections. These groups are in full agreement that the Lakota which is 3000' deeper is a perfect disposal zone.

There is no proven fracture point for Judith, thus future fresh water needs are at jeopardy. Right now, the Judith River provides water for livestock use near the cities of Wolf Point and Glasgow. Drought conditions and poor drinking water quality are making many consider alternative sources of water. EPA is jeopardizing the quality of life for my children. The Judith River should be left alone. The degradation of ground water on the Reservation makes this a necessity, not a wish! Right now, I cannot drink from our faucets as the oil industry raised havoc with our one and only water source. Cooking and drinking water must be bought and hauled. A tragedy that should be avoided!

We notice while studying EPA's "Statement of Policy & Technical Evaluation" dated December 1985 that words such as no data, insufficient data, but, etc. are used often and always with the public's loss resulting. Our children will suffer from EPA's lack of knowledge and pressure brought on from oil companies. Right now our fresh water is so important. One does not realize just how important it is until there is none. Tap drinking water is a luxury now.

Please do not allow injections into the Judith River Formation. This zone should be left to the future of our children, our livestock, and our irrigation projects. Please do not be short sighted.

Sincerely,

Robert & Connie Zimmerman

Robert and Connie Zimmerman

cc: Senator John Melcher
Senator Ron Harlensee
Max Baucus
Pat Williams

ADVERTISING ORDER

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ORDER NUMBER

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE

DATE

U.S. ENVIRONMENTAL PROTECTION AGENCY, Water Management Division

12/20/85

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charged to private individuals with the usual discounts. It is to be set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications.

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PUBLIC NOTICE

EDITION OF PAPER ADVERTISEMENT APPEARED

NUMBER OF TIMES ADVERTISEMENT APPEARED

ONE TIME ONLY

DATE(s) ADVERTISEMENT APPEARED

December 30, 1985 (or prior to)

SPECIFICATIONS FOR ADVERTISEMENT

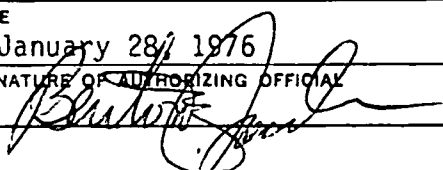
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COPY FOR ADVERTISEMENT

COPY ATTACHED FOR PUBLIC NOTICE -

U.S. ENVIRONMENTAL PROTECTION AGENCY
PUBLIC NOTICE
UNDERGROUND INJECTION CONTROL PROGRAM
FINAL DETERMINATION

Injection into the Judith River Formation
on the Fort Peck Reservation

AUTHORITY TO ADVERTISE		INSTRUMENT OF ASSIGNMENT	
NUMBER	EPA Delegations Manual 1-1-A(3)	NUMBER	
DATE	January 28, 1976	DATE	12/20/85
SIGNATURE OF AUTHORIZING OFFICIAL		TITLE	Contract Specialist

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Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or leaded or prominent headings, unless specifically ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid and the advertisement copy submitted to the publisher will be attached to the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

DEPARTMENT OF HIGHWAYS & TRAFFIC.
D.C. Bids are requested for first spring 1986 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C-5576-H, consisting of 11,000 sq. yds. PCC Class BB sidewalk repair and 2,000 cu. yds. PCC Class A pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Sealed bids to be opened in the Procurement Office at 8:00 p.m., November 16, 1985.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to ▶.....

IMPORTANT

Charges for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition stated in this order.